

KAPLAN HECKER & FINK LLP

350 FIFTH AVENUE | 63RD FLOOR
NEW YORK, NEW YORK 10118
TEL (212) 763-0883 | FAX (212) 564-0883
WWW.KAPLANHECKER.COM

DIRECT DIAL 917.892.7920
DIRECT EMAIL shecker@kaplanhecker.com

January 14, 2022

VIA ECF

The Honorable John Cronan
United States District Judge
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 20C
New York, New York 10007

Re: United States v. Marianna Levin, No. 20 Cr. 681 (S.D.N.Y.)

Dear Judge Cronan:

We represent Marianna Levin in the above-captioned action. We write with the Government's consent to seek a 30-day adjournment of the upcoming January 18, 2022 motions deadline in this matter, as well as of the February 18, 2022 status conference.

We have been in discussion with the Government regarding requests for additional discovery and clarification of the Superseding Indictment in contemplation of whether it is necessary to move for a bill of particulars pursuant to Federal Rule of Criminal Procedure 7(f). While our discussions with the Government have been productive, we expect that further discussion will narrow the issues and may obviate the need for a motion. As such, we respectfully request that the Court adjourn the January 18, 2022 motion deadline by 30 days—to February 17, 2022—to allow for additional time to meet and confer with the Government. Similarly, we respectfully request that the February 18, 2022 conference date be adjourned by 30 days—to March 21, 2022, or at the Court's convenience—to permit sufficient time for these further discussions and any motion practice, if necessary.

Thank you for your attention to this matter.

Respectfully submitted,



Sean Hecker
Jenna M. Dabbs

KAPLAN HECKER & FINK LLP

2

Alexandra Conlon
KAPLAN HECKER & FINK LLP
350 Fifth Avenue, Suite 7110
New York, New York 10118
Telephone: (212) 763-0883
Facsimile: (212) 564-0883
shecker@kaplanhecker.com
jdabbs@kaplanhecker.com
aconlon@kaplanhecker.com

Counsel for Marianna Levin

cc: AUSAs Nicholas William Chiuchiolo, Nicholas Folly, and Daniel George Nessim (via ECF)

Defendant Levin's request is granted in part. The Court adjourns the January 18, 2022, motion deadline as to Ms. Levin only until February 17, 2022, to allow for additional time to meet and confer with the Government. Should any other Defendant request a like adjournment of the motion deadline, they shall submit that request by the January 18, 2022 deadline.

The Court will keep the conference for Ms. Levin, and the other defendants, currently scheduled for February 18, 2022, at 10:00 a.m. At that conference, the Court will discuss whether any filed motions require argument or an evidentiary hearing, and also ask for a status of this case from the Defendants and the Government.

SO ORDERED.

Date: January 15, 2022

New York, New York



JOHN P. CRONAN
United States District Judge